Case: 1:09-cv-01521 Document #: 233 Filed: 09/22/11 Page 1 of 3 PageID #:8739

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

EDGE CAPTURE L.L.C., and EDGE SPECIALISTS, L.L.C.,	)
Plaintiffs,	) Civil Action No. 09-cv-1521
v. BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., UBS AG, UBS FINANCIAL SERVICES INC., UBS SECURITIES LLC, WOLVERINE TRADING, L.L.C., AND WOLVERINE EXECUTION SERVICES, L.L.C.,	<ul> <li>Judge Charles R. Norgle, Sr.</li> <li>Magistrate Judge Denlow</li> </ul>
Defendants.	)

## **NOTICE OF MOTION**

TO:

Ronald J. Schutz Munir R. Meghjee Sang A. Young Brodie Seth A. Nielsen Anthony G. Beasley ROBINS, KAPLAN, MILLER &

800 LaSalle Avenue, Suite 2800 Minneapolis, MN 55402

Phone: (612) 349-8500

Miles A. Finn

CIRESI, L.L.P.

ROBINS, KAPLAN, MILLER & CIRESI, L.L.P.

601 Lexington Avenue, Suite 3400 New York, NY 10022

Phone: (212) 980-7439

Patrick G. Burns Gavin James O'Keefe Justin R. Gaudio

**GREER, BURNS & CRAIN, LTD.** 300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606 Phone: (312) 360-0800

Robert W. Unikel Deanna L. Keysor Michelle K. Marek KAYE SCHOLER LLP 3 First National Plaza 70 West Madison Street Suite 4100 Chicago, IL 60602-4231

Phone: (312) 583-2300

PLEASE TAKE NOTICE that on Tuesday, September 27, 2011, at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Morton Denlow, or any judge sitting in his stead in Courtroom 1350, United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, and shall then and there present the Barclays and UBS Defendants' Motion to Prevent Disclosure of Their Confidential Information to Dr. Israel Nelken, a copy of which is served herewith.

Dated: September 22, 2011 Respectfully submitted,

By: /s/ Jeffrey G. Randall

Jeffrey G. Randall (admitted *pro hac vice*) Jeffrey D. Comeau (admitted *pro hac vice*) PAUL HASTINGS LLP 1117 S. California Avenue Palo Alto, CA 94304-1106

Tel: (650) 320-1800

Allan M. Soobert (admitted *pro hac vice*) PAUL HASTINGS LLP 875 15th Street, N.W. Washington, DC 20005

Tel: (202) 551-1700

Emily Newhouse Dillingham PAUL HASTINGS LLP 191 N. Wacker Drive Chicago, IL 60606 Tel: (312) 499-6292

Attorneys for Defendants Barclays Bank PLC, Barclays Capital Inc., UBS AG, UBS Financial Services Inc., and UBS Securities LLC Case: 1:09-cv-01521 Document #: 233 Filed: 09/22/11 Page 3 of 3 PageID #:8741

## **CERTIFICATE OF SERVICE**

I, Jeffrey G. Randall, hereby certify that on September 22, 2011 I caused a true and correct copy of the foregoing Notice of Motion of the Barclays and UBS Defendants' Motion to Prevent Disclosure of Their Confidential Information to Dr. Israel Nelken, to be served by electronic filing using the CM/ECF system upon:

Anthony Beasley agbeasley@rkmc.com

Sang A. Young Brodie sybrodie@rkmc.com, mjlarson@rkmc.com, mmtacheny@rkmc.com

Patrick G. Burns pburns@gbclaw.net, docket@gbclaw.net

Miles A. Finn mafinn@rkmc.com

Justin R. Gaudio jgaudio@gbclaw.net

Deanna Keysor deanna.keysor@kayescholer.com

Michelle K. Marek michelle.marek@kayescholer.com

Munir R. Meghjee mrmeghjee@rkmc.com, ljlewis@rkmc.com, jkcornelius@rkmc.com

Seth A. Nielsen sanielsen@rkmc.com

Gavin James OKeefe <a href="mailto:gokeefe@gbclaw.net">gokeefe@gbclaw.net</a>

Ronald Schutz rjschutz@rkmc.com

Robert W. Unikel

Robert.unikel@kayescholer.com; maondil@kayescholer.com

Dated: September 22, 2011 By: /s/ Jeffrey G. Randall